

TECHNICAL REVIEW DOCUMENT
For
MODIFICATION TO
OPERATING PERMIT 95OPBO150
to be issued to:

Roche Colorado Corporation
Boulder County
Source ID 0130025

Prepared by Cathy Rhodes
March, 2002

I. PURPOSE:

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Conclusions in this document are based on information provided in the modification application submittal received February 19, 2002.

Any revisions made to the underlying construction permits associated with this facility in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Modification Description:

This facility is subject to the provisions of 40 CFR Part 63, Subpart GGG, the Maximum Achievable Control Technology (MACT) standards for pharmaceuticals production. The EPA promulgated these rules in 1998, requiring a compliance date of September 21, 2001. Subsequently, the EPA changed the compliance date to October 21, 2002. In addition, the EPA published revisions to the rule on August 2, 2001.

40 CFR Part 63, Subpart A, Section 63.6 provides that sources may apply for an extension of the MACT compliance date. The compliance date may be extended for up to one year after the promulgated compliance date. In December of 2001, Roche applied for a one year extension of the MACT compliance date (to October 21, 2003), and the Division approved Roche's request. Section 63.6 requires the incorporation of such extensions into the Operating Permit. This modification serves to meet the requirements of Section 63.6.

In order to ensure that the revised MACT rules are met, Roche will make improvements to the pollutant gathering system and to monitoring and data systems, and will construct and operate a second, redundant, thermal oxidizer.

Roche's extension application and the Division's approval are attached.

Other Administrative Amendments are made to the permit, and are listed in Appendix F of the permit.